

**REMARKS**

Claims 1-25 are pending in this application. By this Amendment, the specification is amended, and claims 10 and 12-25 are amended. Claim 13 is amended to correct a typographical error, and claims 10, 12 and 14-25 are amended for claim dependency purposes only. Reconsideration based on the above amendments and following remarks is respectfully requested.

The courtesies extended to Applicants' representative by Examiner Albertalli and Primary Examiner Smits at the interview held July 8, 2004, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicants' record of the interview.

**I. The Specification Satisfies All Formal Requirements**

The Office Action objects to the specification for various informalities. The specification is amended as discussed with, and agreed to by Examiners Albertalli and Smits at the July 8, 2004 personal interview.

Withdrawal of the objection to the specification is respectfully requested.

**II. The Claims Satisfy All Formal Requirements**

The Office Action objects to claims 10 and 14-24 for various informalities. As discussed with, and agreed to by Examiners Albertalli and Smits at the July 8, 2004 personal interview, claims 10 and 14-24 are amended to reflect proper claim dependency.

Withdrawal of the objection to the claims is respectfully requested.

**III. Claims 12 and 25 Satisfy the Requirements of 35 U.S.C. §112, Second Paragraph**

The Office Action rejects claims 12 and 25 under 35 U.S.C. §112, second paragraph, for various informalities. Claims 12 and 25 are amended as discussed with, and agreed to by Examiners Albertalli and Smits at the July 8, 2004 personal interview.

Withdrawal of the rejection of claims 12 and 25 under 35 U.S.C. §112, second paragraph, is respectfully requested.

**IV. Pending Claims 1-25 Define Patentable Subject Matter**

The Office Action rejects claims 1-11 under 35 U.S.C. §103(a) over U.S. Patent No. 5,708,822 to Wical (hereafter "Wical") in view of "The Linguistic Structure of Discourse" by Polanyi (hereafter "Polanyi 1"); and rejects claims 13-24 under 35 U.S.C. §103(a) over Wical in view of "A Formal Model of the Structure of Discourse" by Polanyi (hereafter "Polanyi 2") and further in view of Polanyi 1. The rejections are respectfully traversed.

As asserted by Applicants' representative at the July 8, 2004 personal interview, Wical, in combination with Polanyi 1, fails to disclose or suggest a system of discourse analysis usable to analyze a text, comprising, *inter alia*, a modifier determining circuit that determines if a unit of text provides context setting information for information encoded further along in a text, as set forth in independent claim 1.

The Office Action asserts that Wical, at col. 10, lines 45-49, discloses this modifier feature. Applicants respectfully disagree with the Office Action's interpretation of Wical.

Wical, at col. 10, lines 45-49, only discloses adverbial clauses. For example, Wical, at col. 10, lines 45-49, discloses:

AdvClauseInit: Identifies adverbial clauses at the beginning of a main clause that are not necessary to the meaning. Only those clauses that contrast to the information in the main clause will not be tagged.

ex: After they had voted, the race was run on Sunday.

(emphasis added)

However, the adverbial clauses disclosed in Wical have no correspondence or are not equivalent to a modifier determining circuit that determines if a unit of text provides context setting information for information encoded further along in a text.

The specification, at least at page 6, lines 19-23, describes in detail the modifier determining circuit 160, as well as provides examples of modifier text building units:

Some examples of modifier and content text building units include "having arrived home early, John ate lunch." The phrase, "having arrived home early" provides context for the content information that John ate lunch. Similarly, in the phrase, "By doing her homework on the bus, Mary had time for piano practice", "by doing her homework on the bus," is a modifier text building unit.

Further, the specification, at least at page 6, line 29 to page 7, line 3, provides additional details on modifier text building units:

modifier text building units are often encoded in the form of "(VERB)ing" or "having (VERB)ed", as well as in prepositional phrases specifying location, time, circumstance or manner. In the linear organization of English, modifier text building units are normally placed before a clause that they modify. The conventions of written English require these modifiers text building units to be separated by a comma from the rest of the sentence. This comma can be "heard" in reading the sentence aloud, where prosodic cues of intonation, phrasing and pausing indicate the break point.

A simple comparison of the example in Wical, at col. 10, line 49, with the examples provided in the specification (as described above), clearly shows the adverbial clause text unit disclosed in Wical is not a modifier text building unit.

Thus, Applicants respectfully submit that Wical fails to disclose or suggest a modifier determining circuit that determines if a unit of text provides context setting information for information encoded further along in a text, as set forth in independent claim 1.

Further, as asserted by Applicants' representative at the July 8, 2004 personal interview, Wical, in combination with Polanyi 1 and Polanyi 2 fails to disclose or suggest a method of discourse analysis of a text, comprising, *inter alia*, determining if that unit of text

is a modifier providing context setting information for information encoded further along in the text, as set forth in independent claim 13.

The Office Action does not explicitly indicate where in the applied art, this feature of claim 13 is disclosed. However, Applicants submit that, for at least the reasons discussed above, Wical, alone or in combination with Polanyi 1 and Polanyi 2, fails to disclose or suggest determining if that unit of text is a modifier providing context setting information as set forth in claim 13.

For at least these reasons, Applicants respectfully submit that independent claims 1 and 13 are patentable over that applied art. Claims 2-12 and 14-25, which depend from independent claims 1 and 13, respectively, also are patentable over the applied art for at least the reasons discussed above, as well as for the additional features they recite thereof.

Withdrawal of the rejection of claims 1-25 under 35 U.S.C. §103(a) is respectfully requested.

**V. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-25 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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